

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

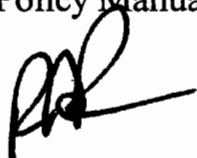
Mel Carnahan, Governor • Stephen M. Mahfood, Director

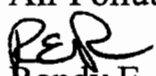
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

MEMORANDUM

DATE: **APR 27 1998**

TO: Air Pollution Control Program Policy Manual

THROUGH: Roger D. Randolph, Director
Air Pollution Control Program 

FROM: 
Randy E. Raymond, Permit Section Chief
Air Pollution Control Program

SUBJECT: Particulate Matter Clarification

The recent rulemaking establishing a new *de minimis* level for Particulate Matter (PM) in 10 CSR 10-6.020 subsection (3)(A), Table 1— *De Minimis* Emission Levels has caused some confusion. The *de minimis* level was established consistent with the federal regulations that set the "significance" levels. However, setting a level in this table has several consequences across the Air Program beyond the Prevention of Significant Deterioration (PSD) requirements.

This memorandum is intended to explain the Air Program's intentions regarding these other areas affected and provide guidance on how this new *de minimis* level will be used. Where any rule specifies the pollutant and associated methods of determining compliance, the plain reading of the terms and limitations will govern the application of the rule.



RECYCLED PAPER

Construction and Operating Permit Applicability

(A) *Part 70 Installations*

The Air Program will seek guidance from U.S. EPA on how to determine when major stationary sources trigger applicability for particulate matter. We will follow EPA's guidance when received. The Air Program will continue to use particulate matter less than ten microns (PM₁₀) for determining applicability to the rules.

(B) *Intermediate and Basic State Installations*

The Air Program does not have emission factors for the current pollutant designated PM. Therefore we are unable to accurately calculate PM emissions in order to make an applicability determination. Lacking this necessary information, the Air Program will not use PM emissions as the basis for Intermediate and Basic Permit applicability. The Air Program will continue to use PM₁₀ for permit applicability.

Emission Fees

Emission fees will not be based on PM emissions. This again is due to the lack of sufficient information regarding determination of actual PM emissions. PM₁₀ will continue to be the regulated air pollutant indicator of PM emissions for emission fee purposes.

RER/trb